

DEREK SCHMIDT

*Attorney General of Kansas*

Brant M. Laue (KS Bar No. 16857)

*Solicitor General*

STATE OF KANSAS

OFFICE OF THE ATTORNEY GENERAL

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Telephone: (785) 368-8539

Fax: (785) 296-3131

brant.laue@ag.ks.gov

*Counsel for Proposed Defendant-Intervenor*

*State of Kansas*

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION**

**KELSEY CASCADIA ROSE JULIANA, et al.,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA, et al.,**

Defendants.

Case No. 6:15-cv-01517-AA

**PROPOSED DEFENDANT-  
INTERVENOR STATE OF  
KANSAS'S MOTION FOR  
LIMITED INTERVENTION AND  
MEMORANDUM IN SUPPORT**

**MOTION**

Pursuant to Local Rule 7-1(a), lead counsel for the other Proposed Defendant-Intervenor States have indicated that they do not oppose this motion. The other parties already have indicated their opposition to the states' motion. Doc. 475.

Pursuant to Federal Rule of Civil Procedure 24, Proposed Defendant-Intervenor the State of Kansas moves this Court for an order allowing it to intervene as defendant in this case as of right, or in the alternative permissibly, for the limited purposes of participating in settlement negotiations; if necessary, objecting to any proposed settlement; and opposing Plaintiffs' motion for leave to amend and file a second amended complaint. Doc. 462.

The same motion (Doc. 475) was filed on June 8, 2021, by a group of states, and it is the intent of this Proposed Defendant-Intervenor to join in that motion and the arguments in support of it, without any further separate filings, briefing, or argument on this motion filed by the State of Kansas.

**MEMORANDUM**

This Proposed Defendant-Intervenor hereby joins in and adopts the arguments made in the "Proposed Defendant-Intervenors' Motion for Limited Intervention and Memorandum in Support" filed in this case on June 8, 2021. Doc. 475. Although the State of Kansas is reassured by the recent statement of the United States that the climate change executive order "did not alter the United States' view that this case is non-justiciable and should be dismissed," Doc. 498 at p. 4, it still wishes to join the other states as an intervenor in this matter.

**CONCLUSION**

The State of Kansas respectfully requests that the Court grant its motion to intervene for the limited purposes of participating in settlement negotiations; if necessary, objecting to any proposed settlement; and opposing Plaintiffs' motion for leave to amend and file a second amended complaint.

Respectfully submitted,

Dated: June 23, 2021

**DEREK SCHMIDT**  
*Attorney General of Kansas*

/s/ Brant M. Laue  
Brant M. Laue (KS Bar No. 16857)  
*Solicitor General*

STATE OF KANSAS  
OFFICE OF THE ATTORNEY GENERAL  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 36130  
Telephone: (785) 368-8539  
Fax: (785) 296-3131  
brant.laue@ag.ks.gov

*Counsel for Proposed Defendant-Intervenor*  
*State of Kansas*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Oregon by using the CM/ECF system, which will send notification of such to the attorneys of record.

*/s/ Brant M. Laue*  
Counsel for State of Kansas